IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

ICONTROL NETWORKS, INC., a Delaware corporation, **Plaintiff,** **v.** **ZONOFF INC., a Delaware corporation,** **Defendant.**	**CIVIL ACTION** **NO. 1:15-CV-1109-GMS**

ZONOFF INC.'S MOTION TO DISMISS AND FOR A MORE DEFINITE STATEMENT

Pursuant to Rule 12(b)(6) and 12(e) of the Federal Rules of Civil Procedure, and for the reasons set forth in the accompanying memorandum in support hereof, defendant Zonoff Inc. ("Zonoff") respectfully moves the Court to dismiss plaintiff Icontrol Networks, Inc.'s ("Icontrol") claims for willful infringement, to dismiss Icontrol's claim for pre-suit damages, and to require a more definite statement of the Complaint identifying the specific claims of the three patents-in-suit that are alleged to be indirectly infringed by Zonoff.

DATED: January 29, 2016

/s/ Colm F. Connolly
Colm F. Connolly (I.D. No. 3151)
Jody C. Barillare (I.D. No. 5107)
MORGAN, LEWIS & BOCKIUS LLP
The Nemours Building
1007 North Orange Street, Suite 501
Wilmington, Delaware 19801
302.574.3000
cconnolly@morganlewis.com
jbarillare@morganlewis.com

and

Thomas B. Kenworthy (Admitted *Pro Hac Vice*)
John V. Gorman (Admitted *Pro Hac Vice*)
Kenneth J. Davis (Admitted *Pro Hac Vice)*
MORGAN, LEWIS & BOCKIUS LLP
1701 Market Street
Philadelphia, Pennsylvania 19103-2921
215.963.5000

tkenworthy@morganlewis.com
jgorman@morganlewis.com
kdavis@morganlewis.com

Attorneys for Defendant Zonoff Inc.